

January 3 , 2023

From:

Nadire Atas (Plaintiff)

To:

United States District Court

Southern District of New York

Judge J. Paul Oetken, United States District Judge

Case Number : 22-CV-00853-JPO

1. I am the Pro Se Plaintiff in Case Number : 22-CV-00853-JPO and a Canadian national residing in Ontario, Canada
2. I filed a third amended complaint on December 28, 2022 with order from the Court,
3. With the holiday season over, I have been able to run my third complaint by a lawyer and discuss with a lawyer .
3. **I ask for permission of fifteen (15) days to file a fourth (4th) amended complaint to expand on the summary of the action in my complaint and on the factual allegations in my complaint .**
4. In addition, I would like to plead *inter alia* the following cause of actions :
 - a. Deliberate Infliction of Harm
 - b. Civil Conspiracy
 - c. Defamation Per Se
 - d. Defamation by Implication

- e. Defamation Slander
- f. Emotional Distress, Intentional Infliction
- g. Injurious Falsehood
- h. A Prima Facie Claim of Defamation
- i. Intentional Infliction of Emotional Distress
- j. Negligent Infliction of Emotional Distress
- k. Negligence and Gross Negligence
- l. Defendants' Tortious Conduct Has Caused Plaintiff to Suffer Special Damages
- m. Conflict of interest of the Journalist and the New York Times

Respectfully

Nadire Atas (Plaintiff) Case Number : 22-CV-00853-JPO)